

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO
SELL PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES TO PORTABLE MUD SYSTEMS, INC.**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED
HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances to Portable Mud Systems, Inc., and in support thereof would respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The assets proposed to be sold are described and scheduled on Exhibit “A” attached hereto. The Debtor believes the sales price set forth on Exhibit “A” attached hereto approximates the market value of the items proposed to be sold herein. The sale shall be made pursuant to the terms of the Equipment Sale, Settlement and Release Agreement (the “Sale Agreement”) attached hereto as Exhibit “B”. To the extent the terms of this Motion differ from those of the Sale Agreement the terms of the Asset Purchase Agreement shall control.

3. The Debtor proposes to sell the personal property to Portable Mud Systems, Inc. (who is not related to the Debtor) for a lump sum cash payment in the amount of \$570,676.00. The Debtor has sold/leased personal property (equipment) to Portable Mud Systems, Inc. during the course of this bankruptcy case.

4. The sale is as is, where is.

5. All items proposed to be sold herein are pledged as collateral to WTF Rentals, LLC. WTF Rentals, LLC filed its secured Proof of Claim No. 26 in the amount of \$3,263,549.10 on April 10, 2017, with the appropriate security documents supporting its secured claim attached to the Proof of Claim.

6. The Debtor believes that the proposed sale of the equipment set forth on Exhibit “A” attached hereto generates a reasonable value based upon the assets proposed to be sold and their marketability. The Debtor has been marketing the equipment to a number of parties, several of

whom toured the equipment at the Debtor's yard in New Mexico. The Debtor received several low ball offers which it declined. An appraisal of the equipment has been performed for WTF Rentals, LLC which supports the proposed sales price set forth herein. Much of the equipment needs repairs/refurbishment to bring it into working condition.

7. The proceeds from the sale are to be paid to WTF Rentals, LLC as a partial payment on WTF Rentals, LLC's secured claim.

8. The Debtor is requesting that the sale of the equipment as described in Exhibit "A" attached hereto to Portable Mud Systems, Inc. be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code.

9. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code, the personal property set forth on Exhibit "A" attached hereto to Portable Mud Systems, Inc. in exchange for a lump sum cash payment in the amount of \$570,676.00, pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: October 19, 2017.

RESPECTFULLY SUBMITTED,

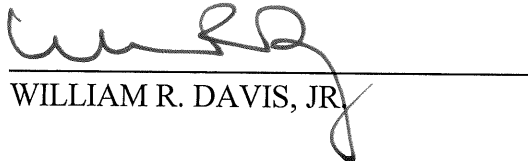


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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on October K, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.



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c/o Mr. Lynn Frazier
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Corpus Christi, TX 78405

U.S. Trustee
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San Antonio, TX 78295-1539

Eddy County Treasurer
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Carlsbad, NM 88220

First National Bank of Beeville
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Beeville, TX 78102

Midland Central Appraisal District
P.O. Box 908002
Midland, TX 79708

Midland County
c/o Laura J. Monroe
P.O. Box 817
Lubbock, TX 79408

Nueces County
P.O. Box 2810
Corpus Christi, TX 78403

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Gary Sweetman
226 Augusta Drive
Portland, TX 78374

Magnum Oil Tools Int'l, Ltd.
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405

Crain, Caton & James
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Houston, TX 77010-4035

Stang Automation, Inc.
100 Pointe Marcelle Beaumont
Alberta T4X 0G2 Canada

Ber Mar Rewind, Ltd.
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Kirby-Smith Machinery, Inc.
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Williams Scotsman, Inc.
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Forrest Tire, Inc.
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ASK Environmental Equipment
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